



CDSS

WILL LIGHTBOURNE  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

February 25, 2016

Lori Cox, Director  
Alameda County Social Services Agency  
2000 San Pablo Ave., 4<sup>th</sup> Floor, Suite #445  
Oakland, CA 94612

Dear Ms. Cox:

Thank you for submitting your agency's Corrective Action Plan which responded to our Civil Rights Compliance Review on September 15-19, 2014. Before approval of the Corrective Action Plan, however, we are requesting the following information:

**III. Dissemination of Information**

- Method to inform clients of availability of translated Pub 13 in all languages available.

**IV. Facility Accessibility for Individuals with Disabilities**

**North Oakland Self-Sufficiency Office**

- Expected date of completion for facility corrective action(s).
- Instructional/Directional signage not translated into threshold languages – Corrective action response required.

**South County Eden Mutli-Service Office**

- Instructional/Directional signage not translated into threshold languages – Corrective action response required.

**Eastmont Office**

- Expected date of completion for facility corrective action(s).

**Edgewater Office**

- Determination of office use; public access or non-public access.

Please submit your additional information addressing the above deficiency(ies) to our office by March 25, 2016. Upon receipt of the requested revisions/information, our office will approve the Corrective Action Plan.

If you have any questions, please contact Elsa Vazquez at (916) 654-2107. You may also contact her by e-mail at [Elsa.Vazquez@dss.ca.gov](mailto:Elsa.Vazquez@dss.ca.gov).

Sincerely,

***Original signed by Chief***

JIM TASHIMA, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

c: Darleen Brooks, Civil Rights Coordinator



2014 Corrective Action Response  
submitted by  
Darleen Brooks, CRC

### **III. Dissemination of Information**

#### **B. Corrective Actions**

<b>Informational Element</b>	<b>Corrective Action Required</b>	<b>Agency Response</b>
Translated Pub 13	ACSSA shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language.	This was corrected in 2015. The Social Services Agency will continue to ensure the Pub 13 "Your Rights Under California Welfare Programs" 06/11 in all languages that are available through CDSS in its waiting rooms.
Auxiliary aids	ACSSA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility.	The Social Services Agency has contracted with Accents on Languages, Interpreter's Unlimited, Geneva Worldwide, and Excel Interpreting Services to provide American Sign Language (ASL) interpreters for all clients who are non-English-speaking and hearing impaired. In addition, each office reception desk has available Braille, and auditory aids upon request for all clients.
Posters	ACSSA shall ensure that the most current version of posters on non-discrimination provided by CDSS and USDA are prominently displayed in all waiting area and reception rooms.	As of the 2015 Compliance Audit current posters were displayed in all offices. The most current posters, Pub 13, 86 and For, AD 475B are displayed in all offices.

#### **C. Observation**

1. The additional signage by the security desk has been removed from the security desk.
2. The Pub 86 poster in the lobbies have been replaced with the latest versions of Pub 13, Pub 86 and Form AD 475B and the Civil Rights Coordinator's contact information is displayed on the top left corner of the Pub 86 poster.

#### **A. Findings and Corrective Actions**

#### IV. Facility Accessibility for Individuals with Disabilities

##### 1. Facility Location : South County Eden Multi-Service, 24100 Amador St., Hayward, CA

Facility Element	Findings	Corrective Action	Agency Response
Parking	There is no "Unauthorized" signage at entrance to off-street accessible parking. <b>*(Repeat finding from 2013)</b>	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. <b>(CA T24 11B-502.8) pg 170</b>	<b>CORRECTED:</b> "Unauthorized" signage was installed at the entrance in November 2014.
Parking	There were 13 accessible parking spaces, and only 1 van parking space. The requirement would be there should be 2 van accessible parking spaces.	For every 6 or fraction of 6 parking spaces at least 1 shall be a van parking space. <b>(CA T24 11B-208.2.4)(ADA 208.2.4) pg. 176</b>	<b>Corrective Action Plan:</b> Work order #3320 was sent to property management with a request to correct. Property management was notified that corrective action is needed within 60 days.
Parking	There is no additional signage or additional language below the symbol of accessibility stating "Minimum Fine \$250" <b>*(Repeat finding from 2013)</b>	Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250". <b>(CA T24 11b-502.6.2) pg 169</b>	<b>CORRECTED:</b> Additional signage with the "Minimum Fine \$250" language was installed in November 2014.
Parking	Signage on pavement does not clearly depict wheelchair occupant because of fading, needs to be repainted.	The parking space shall be marked with an International Symbol of Accessibility...white on a blue background- a minimum 36" wide x 36" high. <b>(CA T24 11B-</b>	<b>CORRECTED:</b> Parking lot was repainted in June 2014. The International Symbol of Accessibility was repainted.

Facility Element	Findings	Corrective Action	Agency Response
		<b>502.6.4.1) pg 169</b>	
Parking	The words “no Parking” painted on pavement in access aisles are faded and needs to be repainted. <b>*(Repeat finding from 2013)</b>	The words “NO PARKING” shall be painted on the surface of each access aisle. <b>(CA T24 11B-502.3.3) pg 176</b>  This notice shall be painted in white letters a min. of 12” in height and located to be visible from the adjacent vehicular way. <b>(CA 11B-502.3.3) pg 176</b>	<b>CORRECTED:</b> Parking lot was repainted in June 2014. T The words “NO PARKING” were repainted.
Parking	Ramp slope in between accessible spaces should not be steeper than 8/3%. The ramp was too steep measuring between 9.3%-10.8%	Ramp runs shall have a running slope no steeper than 1:12 <b>(CA T24 11B-405.2) (ADA 405.2) pg 183</b>	<b>Corrective Action Plan:</b> Work order #3321 was sent to property management with a request to correct. Property management was notified that corrective action is needed within 60 days.
1 <sup>st</sup> floor Men’s Restroom	Door Pressure is excessive at 13 lbs.	The force for pushing or pulling open a door shall be as follows: 1. Interior hinged doors and gates: 5 lbs max. 2. Sliding or folding doors: 5 lbs max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs max. <b>(CA T 24 11B-404.2.9 (1-4)) (ADA 404.2.9 (1&amp;2)) pg 224</b>	<b>CORRECTED:</b> ACME security reduced the pressure on the door in November 2014.

Facility Element	Findings	Corrective Action	Agency Response
1 <sup>st</sup> floor Women's Restroom	Door pressure is excessive at 12 lbs.	<p>The force for pushing or pulling open a door shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs max.</li> <li>2. Sliding or folding doors: 5 lbs max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs.</li> </ol> <p>Exterior hinged doors: 5 lbs max. <b>(CA T 24 11B-404.2.9 (1-4)) (ADA 404.2.9 (1&amp;2)) pg 224</b></p>	<b>CORRECTED:</b> ACME Security reduced the pressure on the door.
3 <sup>rd</sup> floor Men's Restroom	Door pressure is excessive at 14 lbs.	<p>The force for pushing or pulling open a door shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs max.</li> <li>2. Sliding or folding doors: 5 lbs max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs.</li> </ol> <p>Exterior hinged doors: 5 lbs max. <b>(CA T 24 11B-404.2.9 (1-4)) (ADA 404.2.9 (1&amp;2)) pg 224</b></p>	<b>CORRECTED:</b> ACME Security reduced the pressure on the door.

Facility Element	Findings	Corrective Action	Agency Response
3 <sup>rd</sup> floor Women's Restroom	Door pressure is excessive at 18 lbs.	The force for pushing or pulling open a door shall be as follows: 1. Interior hinged doors and gates: 5 lbs max. 2. Sliding or folding doors: 5 lbs max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs max. <b>(CA T 24 11B-404.2.9 (1-4)) (ADA 404.2.9 (1&amp;2)) pg 224</b>	<b>CORRECTED:</b> ACME Security reduced the pressure on the door.
3 <sup>rd</sup> floor Women's Restroom	Towel Dispenser is too high at 46"	Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. <b>(CA T24 11B-603.5) pg 319</b>  All operable parts, including coin slots, shall be 40" max. above the finish floor. <b>CA T24 11B-603.5) pg 319</b>	<b>Corrective Action Plan:</b> Work order #3319 was sent to property management with a request to correct. Property management was notified that corrective action is needed within 60 days.

## 2. Facility Location: North Oakland Self-Sufficiency 2000 San Pablo Ave., Oakland, CA

Facility Element	Findings	Corrective Action	Agency Response
Parking	There is no "Unauthorized" signage at entrance to off-street accessible	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility	This is a leased facility. This correction was requested of the owner upon receipt of this report in October 2015.

Facility Element	Findings	Corrective Action	Agency Response
	parking. *(Repeat finding from 2011)	<p>OR immediately adjacent to on-site accessible parking and visible from each parking space. <b>(CA T24 118-502.8) pg 170</b></p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 <b>(CA T24 118-502.8.1) pg 170</b></p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following:          "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____."  <b>(CAT24 118-502.8.2) pg 170</b></p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign.  <b>(CA T24 11 B-502.8.2) pg 170</b></p>	



Facility Element	Findings	Corrective Action	Agency Response
	<p>Accessible parking spaces in the parking garage do not meet the minimum accessible space requirements: 9'wide,18' long, 5' access aisle</p> <p>Accessible spaces were "too short" in length by 2" to 4", measuring between 14'L &amp; 16'L.</p> <p>Access aisle was too short in length between 2" &amp; 4", measuring between 14'L &amp; 16'L.</p>	<p>Car ... parking spaces shall be 18' long min. <b>(CA T24 11 B-502.2)</b> <b>(ADA 502.2) pg 173</b></p> <p>Car parking spaces shall be 9' wide min. and van parking spaces 12' wide min. shall be marked to define the width and shall have an adjacent access aisle complying with the "Access Aisle" heading in this section. <b>(CA T24 11 B-502.2)</b> <b>(ADA 502.2.) pg 173</b></p> <p>Access aisles shall adjoin an accessible route. <b>(CA T24 11 B-502.3)</b> <b>(ADA 502.3) pg 173</b></p> <p>Two parking spaces shall be permitted to share a common access aisle. <b>(CA T24 11 B-502.3) (ADA 502.3) pg 173</b></p> <p>Access aisles serving car ... parking spaces shall be 5' wide min. <b>(CA T2411B-502.3.1)</b> <b>(ADA 502.3.1) pg 173</b></p> <p>Access aisles shall extend the full required length of the parking</p>	

Facility Element	Findings	Corrective Action	Agency Response
	<p>One of the van-accessible spaces had the access aisle (loading/unloading clearance) on the driver's side of the vehicle.</p> <p><b>*(Repeat finding from 2011')</b></p>	<p>spaces they serve. <b>(CA T24 11 B-502.3.2)</b> <b>(ADA 502.3.2) pg 173</b></p> <p>Access aisle for van parking spaces shall be located on the passenger side of the parking spaces. <b>(CA T24 118-502.3.4)</b> <b>pg 176</b></p>	
Client Interview room	The client interview room did not allow for turnaround in room (5' turnaround, 36" wide pathway, and floor.	<p>Where the accessible route makes a 1800 turn around an element which is less than 48" wide, clear width shall be 42" min. approaching the turn, 48" min. at the turn and 42" min. leaving the turn. <b>(CA T24 118-403.5.2)</b> <b>(ADA 403.5.2) pg 207</b></p> <p>The turning space shall be a space of 60" diameter min. <b>(CA T24 118-304.3.1)</b> <b>(ADA 304.3.1) pg 208</b></p> <p>The turning space shall be a T-shaped space within a 60" x 60" min. square with arms and base 36" wide min. <b>(CA T24 11 8-304.3.2)</b> <b>PQ 208</b></p>	This room is no longer being used. The Social Services Agency now uses client interview room #1007 which meets the required accessible space requirements.
1 <sup>st</sup> floor Men's Restroom	Door pressure is excessive at 10 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as	Corrected by General Services Agency in October 2014.

Facility Element	Findings	Corrective Action	Agency Response
		<p>follows:</p> <p>1. Interior hinged doors and gates: 5 lbs. max.</p> <p>2. Sliding or folding doors: 5 lbs. max.</p> <p>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs.</p> <p>Exterior hinged doors: 5 lbs. max.</p> <p><b>(CA T24 118-404.2.9 (1 - 4» (ADA 404.2.9 (1 &amp; 2)) PQ 224</b></p>	
1 <sup>st</sup> floor Women's Restroom	Door pressure is excessive at 15 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <p>1. Interior hinged doors and gates: 5 lbs. max.</p> <p>2. Sliding or folding doors: 5 lbs. max.</p> <p>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs.</p> <p>Exterior hinged doors: 5 lbs. max.</p> <p><b>(CA T24 118-404.2.9 (1 - 4» (ADA 404.2.9 (1 &amp; 2)) PQ 224</b></p>	Corrected by General Services Agency in October 2014.
2 <sup>nd</sup> floor Men's Restroom	Door pressure is excessive at 13 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <p>1. Interior hinged doors and gates: 5 lbs. max.</p> <p>2. Sliding or folding</p>	Corrected by General Services Agency in October 2014.

Facility Element	Findings	Corrective Action	Agency Response
		<p>doors: 5 lbs. max.  3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs.  Exterior hinged doors: 5 lbs. max.  <b>(CA T24 118-404.2.9 (1 - 4)» (ADA 404.2.9 (1 &amp; 2)) PQ 224</b></p>	
2 <sup>nd</sup> floor Women's Restroom	<p>Door pressure is excessive at 14 lbs.</p> <p>Pipes under sink need to be rewrapped.</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:  1. Interior hinged doors and gates: 5 lbs. max.  2. Sliding or folding doors: 5 lbs. max.  3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs.  Exterior hinged doors: 5 lbs. max.  <b>(CA T24 118-404.2.9 (1 - 4)» (ADA 404.2.9 (1 &amp; 2)) PQ 224</b></p> <p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. <b>(CA T24 118-606.5) (ADA 606.5) pg 330</b></p>	Corrected by General Services Agency in October 2014.

### 3. Recommendation

The parking garage is not owned by the Social Services Agency. The space is shared with a property management company for the Condominiums that are housed above the garage.

The client interview room (#1007) has been designated as the accessible client interview room and the proper ISA signage has been placed to identify it.

### 4. Facility Location: Eastmont Office, 6955 Foothill Blvd, Oakland, CA

Facility Element	Findings	Corrective Action	Agency Response
Parking	<p>This is a shared facility with multiple businesses and the Health Department.</p> <p>The parking spaces measured located nearest the front entrance did not meet the minimum accessible space requirements: 9'wide, 18' long, 5' access aisle</p>	<p>Car ... parking spaces shall be 18' long min. <b>(CA T24 118-502.2) (ADA 502.2) pg 173</b></p> <p>Car parking spaces shall be 9' wide min. and van parking spaces 12' wide min. shall be marked to define the width and shall have an adjacent access aisle complying with the "Access Aisle" heading in this section. <b>(CA T24 118-502.2) (ADA 502.2.) pg 173</b></p> <p>Access aisles shall adjoin an accessible route. <b>(CA T24 118-502.3) (ADA 502.3) pg 173</b></p> <p>Two parking spaces shall be permitted to share a common access aisle. <b>(CA T24 11 B- 502.3) (ADA 502.3) pg 173</b></p> <p>Access aisles serving car ... parking spaces shall be 5' wide min. <b>(CA T2411B- 502.3.1) (ADA 502.3.1) pg</b></p>	This is a leased facility. This correction was requested of the owner upon receipt of this report in October 2015.

Facility Element	Findings	Corrective Action	Agency Response
		<p><b>173</b></p> <p>Access aisles shall extend the full required length of the parking spaces they serve. <b>(CA T24 11 B-502.3.2) (ADA 502.3.2) pg 173</b></p>	
Exterior entrance	There was no International Symbol of Accessibility (ISA) signage at main entrance of building. (*Repeat Finding from 2013)	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs &amp; Identification.  <b>(CA T2411B-216.6) (ADA 216.6) pg 28</b></p> <p>Pictograms and their field shall have a non-glare finish.  <b>(CA T24 11 B-703.6.2) (ADA 703.6.2) pg 376</b></p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field.  <b>(CA T2411B-703.6.2) (ADA 703.6.2) pg 376</b></p>	This is a leased facility. This correction was requested of the owner upon receipt of this report in October 2015.
Men's Restroom	Door pressure is excessive at 15 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall	

Facility Element	Findings	Corrective Action	Agency Response
		<p>be as follows: 1. Interior hinged doors and gates: 5 lbs. max.</p> <p>2. Sliding or folding doors: 5 lbs. max.</p> <p>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to erior hinged doors: 5 lbs. max.  <b>(CA T24 11 B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg 224</b></p>	
	Pipes under sink need to be rewrapped. <b>(*Repeat Finding from 2013)</b>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.  <b>(CA T24 11 B-606.5) (ADA 606.5) pg 330</b></p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. <b>(CA T24 11 B-606.5) (ADA 606.5) pg 330</b></p>	
	<p>Soap dispenser is too high at 48". <b>(*Repeat Finding from 2013)</b></p> <p>Towel dispenser is too high at 48".</p>	<p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route.  <b>(CA T24 11 B-603.5) pg 319</b></p> <p>All operable parts, including coin slots, shall be 40"</p>	

Facility Element	Findings	Corrective Action	Agency Response
		max. above the finish floor. <b>(CA T24 118-603.5) pg 319</b>	
Women's Restroom	<p>Door pressure is excessive at 13 lbs.</p> <p>Pipes under sink need to be rewrapped. <b>(*Repeat Finding 2013)</b></p> <p>Soap dispenser is too high at 49". <b>(*Repeat Finding from 2013)</b></p> <p>Towel dispenser is too high at 48".</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. <b>(CA T24 11 B-404.2.9 (1 - 4» (ADA 404.2.9 (1 &amp; 2» pg 224</b></li> </ol> <p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. <b>(CA T24 11 B-606.5) (ADA 606.5) pg 330</b></p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks. <b>(CA T24 11 B-606.5) (ADA 606.5) pg 330</b></p> <p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be</p>	



Facility Element	Findings	Corrective Action	Agency Response
		<p>located on an accessible route. <b>(CA T2411B-603.5) pg 319</b></p> <p>All operable parts, including coin slots, shall be 40" max. above the finish floor. <b>(CA T24 11 B-603.5) pg 319</b></p>	

#### 5. Facility Location: 7751 Edgewater, Oakland, CA

Facility Element	Findings	Corrective Action	Agency Response
Parking	The signage for "Unauthorized parking" does not have the required language.	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. <b>(CA T24 11 B-502.8) pg 170</b></p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 <b>(CA T24 11B-502.8.1) pg 170</b></p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's</p>	The General Services Agency will complete the parking lot renovation by April 30, 2016.

Facility Element	Findings	Corrective Action	Agency Response
		<p>expense. Towed vehicles may be reclaimed at:_____ or by telephoning _____."</p> <p><b>(CAT24 118-502.8.2) pg 170</b></p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. <b>(CA T24 118-502.8.2) pg 170</b></p>	
	<p>There is no additional signage or additional language below the symbol of accessibility stating "<b>Minimum Fine \$250</b>"</p>	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state "<b>Minimum Fine \$250</b>". <b>(CA T24 118-502.6.2) pg 169</b></p>	
	<p>Accessible parking spaces do not meet the minimum accessible space requirements: 9'wide, 18' long, 5' access aisle</p>	<p>Car ... parking spaces shall be 18' long min. <b>(CA T24 118-502.2) (ADA 502.2) pg 173</b></p>	
	<p>The parking spaces were too short between ½ " to 2" in length.</p>	<p>Car parking spaces shall be 9' wide min. and van parking spaces 12' wide min. shall be marked to define the width and shall have an adjacent access aisle complying with the "Access Aisle" heading in this section. <b>(CA T24 118-502.2) (ADA 502.2.) pg 173</b></p>	
	<p>The words "<b>No Parking</b>" painted on pavement in access</p>	<p>The words "<b>NO PARKING</b>" shall be painted on the surface</p>	

Facility Element	Findings	Corrective Action	Agency Response
	aisles are faded and need to be repainted.	<p>each access aisle. <b>(CA T24 118-502.3.3) pg 176</b></p> <p>This notice shall be painted in white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. <b>(CA 118-502.3.3) pg 176</b></p>	
Main entrance	There was no International Symbol of Accessibility (ISA) signage at main entrance of building.	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs &amp; Identification. <b>(CA T2411B-216.6) (ADA 216.6) pg 28</b></p> <p>Pictograms and their field shall have a non-glare finish. <b>(CA T24 11 B-703.6.2) (ADA 703.6.2) pg 376</b></p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light</p>	This is not a designated public office. This is a secure building and front entrance doors remain locked at all times. Clients (Visitors) and/or representatives only come to this office to view their case files, per their request. Clients can request to view their files at any of the public contact offices.

Facility Element	Findings	Corrective Action	Agency Response
		field. <b>(CA T2411B-703.6.2) (ADA 703.6.2) pg 376</b>	
Water fountain	Drinking fountain does not comply with the following: Location, Clear ground floor space, and alcove depth.	All drinking fountains shall be located completely within alcoves, positioned completely between wing walls, or otherwise positioned so as not to encroach into pedestrian ways. <b>(CA T24 11 B-602.9) pg 304</b>	This is not a designated public office. This is a secure building and front entrance doors remain locked at all times. Clients (Visitors) and/or representatives only come to this office to view their case files, per their request. Clients can request to view their files at any of the public contact offices.
Men's Restroom	Door pressure is excessive at 15 lbs.	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 lbs. max.  2. Sliding or folding doors: 5 lbs. max.  3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. <b>(CA T24 11 B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg 224</b>	Corrected by General Services Agency in October 2014.

<b>Facility Element</b>	<b>Findings</b>	<b>Corrective Action</b>	<b>Agency Response</b>
Unisex Restroom	Door pressure is excessive at 18 lbs.	The force for pushing or pulling excessive at 18 lbs. open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. <b>(CA T24 11 B-404.2.9 (1 - 4»</b> <b>(ADA 404.2.9 (1 &amp; 2)) pg 224</b>	Corrected by General Services Agency in October 2014.

**V. Provision for Services to Applicants And Recipients Who Are Non-English-Speaking or Who Have Disabilities**

<b>Area of Findings</b>	<b>Corrective Actions</b>	<b>Agency Response</b>
Translated Pub 13	Alameda County Social Services Agency shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. (Div. 21-115.2)	The Social Services Agency will make available Pub 13 "Your Rights under California Welfare Programs" 06/11 in all languages that are available through CDSS in its waiting rooms.
Auxiliary Aids	Alameda County Social Services Agency shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision, or manual skills where necessary to afford such persons an equal opportunity to access program services. (Div. 21-115.41)	The Social Services Agency has contracted with Accent on Languages, Interpreter's Unlimited, Geneva Worldwide, and Excel Interpreting Services to provide American Sign Language (ASL) interpreters for all clients who are English-speaking and hearing impaired.  The Social Services Agency will continue to train and remind staff of its policy through unit meetings, Tips of the Month,

Area of Findings	Corrective Actions	Agency Response
		<p>Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services Intranet page, and ongoing trainings offered by the Agency's Training and Consulting Team.</p>
<p>Directional signage</p>	<p>Alameda County Social Services Agency shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English speaking clients, such signage shall be translated into appropriate languages. (Div. 21-107.212 and .24)</p>	<p>The Social Services Agency will make sure that all instructional and directional signs posted in waiting areas and places that are frequented by a substantial number of non-English speaking clients are translated into the County's six (6) threshold languages: Spanish, Chinese, Vietnamese, Cambodian, Farsi, and Tagalog.</p>
<p>Bilingual Staffing</p>	<p>ACSSA shall ensure that a sufficient number of qualified employees shall be assigned to public contact positions in each program and/or location serving a substantial number of non-English speaking persons.</p> <p>The number of public contact positions in each major occupational group shall be determined for each program/location whose non-English language cases equal or exceed five (5) percent of the total cases for each program/location. (Div. 21-115.1)</p>	<p>The Social Services Agency continues to provide a sufficient number of available qualified employees in public contact positions to serve the threshold languages identified by the Agency in each office. Departments within the Agency also work with Human Resources to target additional recruitment of bi/multi-lingual staff whenever there are job vacancies.</p> <p>The Social Services Agency has bilingual staff that is certified in a multitude of languages including the Agency's threshold languages (Spanish, Vietnamese, Cambodian, Chinese, Farsi, and Tagalog). Each department has access to a roster of all staff that have been certified as bilingual. These rosters are located on the Agency's internal shared drive.</p> <p>The Social Services Agency has a contract with Lionbridge Interpretive Language Services to provide interpretive services and is available for services in the event that an insufficient number of bilingual</p>

Area of Findings	Corrective Actions	Agency Response
		<p>staff is available to assist with spoken language needs.</p> <p>The Social Services Agency has contracted with Accent on Languages, Interpreter's Unlimited, Geneva Worldwide, and Excel Interpreting services to provide in-person interpreters and American Sign Language (ASL) interpreters for all clients who are English-speaking and hearing impaired.</p>
Timely Services	Alameda County Social Services Agency must ensure that bilingual/interpretive services are prompt and without undue delay. (Div. 21-115)	<p>The Social Services Agency will continue to train and remind staff of its policy to provide bilingual/interpretive services within the appropriate time frame through unit meetings, Tips of the Month, Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services Intranet page, and ongoing trainings offered by the Agency's Training and Consulting Team.</p> <p>The Agency's goal is to make its services accessible within a short time frame whether that means using a certified bilingual staff member, Lionbridge Interpretive Services, or contracted interpreter for any type of language assistance.</p>
Use of Minors	Alameda County Social Services hall only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances or at the specific request of the applicant/recipient. (Div. 21-115.16)	<p>The Social Services Agency has a policy to only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances.</p> <p>The Social Services Agency will continue to train and remind staff of its policy through unit meetings, Tips of the Month, Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services</p>

Area of Findings	Corrective Actions	Agency Response
		Intranet page, and ongoing trainings offered by the Agency's Training and Consulting Team.
Auxiliary Aids	ACSSA shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services.	<p>The Social Services Agency has contracted with Accent on Languages, Interpreter's Unlimited, Geneva Worldwide, and Excel Interpreting Services to provide American Sign Language (ASL) interpreters for all clients who are English-speaking and hearing impaired.</p> <p>The Social Services Agency will continue to train and remind staff of its policy through unit meetings, Tips of the Month, Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services Intranet page, and on-going trainings offered by the Agency's Training and Consulting Team.</p>

#### **A. Observation**

The Social Services Agency continues to provide a sufficient number of available qualified employees in public contact positions to serve the threshold languages identified by the Agency in each office. Departments within the Agency also work with Human Resources to target additional recruitment of bi/multi-lingual staff whenever there are job vacancies.

The CDSS has not provided recommendations on the sufficient number of bilingual staffing is needed in order to meet the Division 21 regulations for staffing bilingual positions.

#### **VI. Documentation of Applicant/Recipient Case Records**

Areas of Action	Corrective Action	Agency Response
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problem of ineffective communication. The CWD shall be documented in the	The Social Services Agency has policy that requires staff to ask and document a client's preferred language for oral and written communication and have this information documented in case file, at any point of contact. In addition, staff is



Areas of Action	Corrective Action	Agency Response
	<p>case record that the applicant/recipients were so informed. (Div. 21-116.23)</p>	<p>required to document: Acceptance or refusal of written material in his/her language; how bilingual services were provided; if a minor was used temporarily as an interpreter, the circumstances requiring this use; if the client was informed as to potential problems of ineffective communication if they provide their own interpreter; and if the client consented to the release of information to the interpreter if the county uses an interpreter other than a county employee.</p> <p>The Social Services Agency will continue to train and remind staff of its policy through unit meetings, Tips of the Month, Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services Intranet page, and ongoing trainings offered by the Agency's Training and Consulting Team.</p>
<p>Temporary use of a minor (under 18 years of age) as an interpreter</p>	<p>When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring temporary use of minors in the case record. (Div. 21-116.22)</p> <p>Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.</p>	<p>The Social Services Agency has policy that requires staff to ask and document a client's preferred language for oral and written communication and have this information documented in the case file, at any point of contact. In addition, staff is required to document: Acceptance or refusal of written material in his/her language; how bilingual services were provided; if a minor was used temporarily as an interpreter, the circumstances requiring this use; if the client was informed as to potential problems of ineffective communication if they provide their own interpreter; and if the client consented to the release of information to the interpreter if the county uses an interpreter other than a county employee.</p>

Areas of Action	Corrective Action	Agency Response
		<p>The Social Services Agency will continue to train and remind staff of its policy through unit meetings, Tips of the Month, Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services Intranet page, and ongoing trainings offered by the Agency's Training and Consulting Team.</p>
Documentation of interpreter signed confidentiality statement	<p>Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. (Div. 21-116.24)</p>	<p>The Social Services Agency has policy that requires staff to ask and document a client's preferred language for oral and written communication and have this information documented in the case file, at any point of contact. In addition, staff is required to document: Acceptance or refusal of written material in his/her language; how bilingual services were provided; if a minor was used temporarily as an interpreter, the circumstances requiring this use; if the client was informed as to potential problems of ineffective communication if they provide their own interpreter; and if the client consented to the release of information to the interpreter if the county uses an interpreter other than a county employee.</p> <p>The Social Services Agency will continue to train and remind staff of its policy through unit meetings, Tips of the Month, Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services Intranet page, and ongoing trainings offered by the Agency's Training and Consulting Team.</p>
Documentation that bilingual services were provided	<p>Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as</p>	<p>The Social Services Agency has policy that requires staff to ask and document a client's preferred language for oral and written communication and have this</p>

Areas of Action	Corrective Action	Agency Response
	<p>interpreter, volunteer interpreter was used, or client provided interpreter. (div. 21-116.22; ACL 08-65 Documentation of Interpretive Services)</p>	<p>information documented in the case, at any point of contact. In addition, staff is required to document: Acceptance or refusal of written material in his/her language; how bilingual services were provided; if a minor was used temporarily as an interpreter, the circumstances requiring this use; if the client was informed as to potential problems of ineffective communication if they provide their own interpreter; and if the client consented to the release of information to the interpreter if the county uses an interpreter other than a county employee.</p> <p>The Social Services Agency will continue to train and remind staff of its policy through unit meetings, Tips of the Month, Bulletins, and the Agency's LEP Plan on the Agency's Language Access Services Intranet page, and ongoing trainings offered by the Agency's Training and Consulting Team.</p>

## B. Additional Finding

The Agency will continue to train and remind staff to document the use of interpretive services when assisting clients. In addition, staff will be reminded to consistently utilize Language Preference Form 50-85 to document how services are provided at the initial and subsequent contacts.

The Training and Consulting team has incorporated in the Division 21 training for employees how/where to document bilingual certified staff in CalWIN case comments. In addition, staff will be trained and reminded the importance to inform clients of the potential problem of using their own interpreter, and/or signed Release of Confidential information to Interpreter and documenting in case comments.

## **VII. Staff Development and Training**

### **A. Findings and Corrective Actions**

<b>Area of Finding</b>	<b>Corrective Action</b>	<b>Agency Response</b>
Division 21, Civil Rights Training	ACSSA shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process.	ACSSA in collaboration with TACT will continue to ensure that staff receive training at New Employee Orientation and on an ongoing basis for all ACSSA employees. TACT is currently working at updating the curriculum and supporting materials to provide a more robust training ensuring that staff are familiar with Division 21 and have a better understanding the complaint process.

## **VIII. Discrimination Complaint Procedures**

<b>Area of Finding</b>	<b>Corrective Action</b>	<b>Agency Response</b>
Discrimination Process	ACSSA shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes.	The Civil Rights Coordinator is working in collaboration with the Agency's Training and Consulting Team to ensure that staff is taught how to differentiate discrimination complaints from customer service and other complaint processes.
Civil Rights Coordinator	ACSSA shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located.	<p>The Civil Rights Coordinator will continue to ensure that staff is knowledgeable regarding contact information of the Civil Rights Coordinator and where the information can be located.</p> <p>The Civil Rights Coordinator contact information is on the Agency's Intranet Site and on posters in the waiting room area in all of the agency offices.</p> <p>The Civil Rights Coordinator will continue to remind staff through Tips of the Month, and Bulletins, the Civil Rights Resource Guide and on-going trainings offered by the</p>

Area of Finding	Corrective Action	Agency Response
		Agency's Training and Consulting Team.

### C. Additional Finding

Based on the recommendations each year from previous State CDSS auditors the Social Services Agency has consistently provided Division 21 training during orientation for new employees within the first month in the Social Services Agency and every two (2) years. The Staff Development Training Department is currently working in collaboration with the Human Resources Department in a larger effort to provide Division 21 trainings annually. The Training department is currently developing a more comprehensive content to the training module that will provide step-by-step actual worker casework practices/examples related to case documentation and worker requirements when clients use their own interpreters and the differences between the process for resolving discrimination complaints and benefit complaints.

The Civil Rights Coordinator has consistently worked in collaboration with the Training Department, Language Access Coordinator, and Departments to ensure clients complaints, language translations and requests for accommodations are promptly addressed. Even though these functions are housed in separate departments, they are in constant communication with each other to ensure the client's needs are met.

A discrimination complaint log in which all client complaints of discrimination are entered by year and date the complaint received is maintained by the Civil Rights Coordinator only. The Client Advocates role is to confer with customers who have questions or issues with their case or who require some form of intervention as it relates to their program status. Client Advocates respond to customers who call their offices or visit them in person. They handle complaints and concerns regarding benefits and services, and escalate the complaints to designated authorities for further action. They do not handle discrimination complaints.

## XI. COMMUNITY INPUT

Area of Findings	Corrective Action	Agency Response
Interpreter Services	Alameda County Social Services Agency must offer and provide free interpreter services using qualified interpreters. (Div. 21-104q(1) and 21-115)	The Social Services Agency offers free interpreter services in the following situations, but is not limited to these events. At any point of contact a non-English speaking or LEP applicant or recipient presents an "I Speak" card (available in all Agency waiting rooms); points to a language on the agency displayed poster that offers free interpretive services; exhibits confusion or lack of understanding of the English language; makes a request for an interpreter; identifies need for interpretive

Area of Findings	Corrective Action	Agency Response
		<p>services on the language preference form 50-85; and/or person accompanying applicant or recipient makes the request on the behalf of the applicant or recipient.</p> <p>The Social Services Agency will continue to ensure that the needs of the non-English speaking and LEP populations are met by continuing to hire, recruit, and retain bilingual staff that will be able to converse with clients and determine if an interpreter is needed.</p> <p>The Social Services Agency has a contract with Lionbridge Interpretive Language Services to provide interpretive services and is available during business hours.</p> <p>The Social Services Agency uses competent interpreters. "Competency" required that interpreters have demonstrated proficiency in both English and the intended/preferred language; training that includes the skill and ethics of interpreting (e.g. issues of confidentiality); fundamental knowledge of both languages of any specialized terms or concepts; and sensitivity to the client's culture.</p>

#### **A. Major observations/ Reasonable Accommodation**

It is not our practice for the Social Worker to refuse to visit a client in their home for an In-Home Supportive Services appointment. Reasonable accommodation requests from clients are not necessary for the client's need for In-Home Supportive Services must be assessed within his/her residence by the Social Worker.

We are requesting for CDSS to share the case details of this specific complaint so we can research and follow up to ensure the client's needs were met.

## **B. Corrective Actions**

The Agency has and will continue to provide interpretive services through LionBRIDGE Language Line and Certified Bilingual workers. The auditors finding that a worker requested a client to provide their own interpreter was an isolated incident. The agency will continue to remind and train staff of its policy to provide bilingual/interpretive services to our clients.

The Agency has made efforts to communicate with community advocates since 2003. The Agency has attempted to take a more proactive approach specifically with Bay Area Legal Aid and East Bay Community Law Center by working more closely with the Assistant Agency Directors, Program Managers, and Language Access Coordinator to resolve issues with respect to Language Services. Regular meetings have been organized and held between the Assistant Agency Directors, Language Access Coordinator, and community advocates. The Civil Rights Coordinator in the past has attended several meetings with the advocates.

The Agency is currently reviewing the appropriate department for a centralized Civil Rights Unit, which has oversight/accountability for the overall program.